

UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA

John Doe,
Plaintiff,
v.
University of Nebraska,
Defendant.

Civil Action No. [TBD]: **4:25CV3122**

Filed concurrently with:
Civil Rights Complaint;
Motion to Proceed Under Pseudonym;
Motion for Appointment of Counsel.

2025 MAY 30 PM 3:11
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

MOTION TO SEAL PLAINTIFF'S IDENTITY

Plaintiff, who is filing without a lawyer, pro se, respectfully asks the Court to let him file a the attached Confidential Declaration of Plaintiff's Identity under seal. This declaration gives the Court his full legal name and contact information, which are not listed in the public version of the Complaint. This request is being made together with a separate Motion to Proceed Under Pseudonym.

LEGAL BASIS FOR RELIEF

Courts can allow filings under seal when personal privacy or safety could be harmed if certain information is made public. This is especially true in cases that involve sensitive facts, discrimination, or possible retaliation. See *Doe v. Stegall* (1981). This motion is made to protect the purpose of the pseudonym request and to avoid further reputational harm.

REASON FOR THE REQUEST

Plaintiff has attached a short declaration in support of Plaintiff's pseudonym request, Exhibit A, to this motion. In it, he provides:

Plaintiff's legal name, contact information, and identifying details not otherwise available to the public;

Explains reasons why proceeding under a pseudonym is necessary to avoid reputational injury and professional retaliation; and

Identifies specific risks posed by disclosure of Plaintiff's identity at this stage.

The declaration supports his request to be called "John Doe" in public court documents. If it were made public, it would defeat the point of using a pseudonym and could cause additional harm.

CONCLUSION

Plaintiff respectfully requests that the Court:

GRANT this Motion to Seal;

Keep the attached declaration (Exhibit A) sealed and private;

Allow the declaration to remain sealed for the rest of the case, or unless the Court says otherwise; and

Grant any other relief the Court thinks is fair.

Dated: 05/30/2025

Respectfully submitted,
John Doe
Pro Se Plaintiff